

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

QUILL INK BOOKS LIMITED,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	
v.)	Civil Action No. 1:19-cv-476-LO-MSN
)	
RACHELLE SOTO a/k/a ADDISON CAIN,)	
)	
Defendant/Counterclaim Plaintiff.)	

PLAINTIFF’S EXPERT DISCLOSURE – PAYNE HARRISON

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Quill Ink Books Limited (“Plaintiff”), by counsel, hereby provides the following expert disclosure for Payne Harrison, an expert witness who will testify on its behalf at the trial of this matter on an issue on which Plaintiff bears the burden of proof:

1. Payne Harrison, M.A., M.B.A, M.A.F.F. (Retired)
P.O. Box 600681
Dallas, TX 75360

Mr. Harrison is currently an independent consultant who advises clients regarding intellectual property licensing and litigation, among other issues. Previously, Mr. Harrison was a partner in the Stirling Group, which represented Southern Methodist University’s school of electronic gaming in the acquisition of intellectual property rights for the movie *Braveheart* from Paramount Studios. Prior to joining The Stirling Group, Mr. Harrison was Senior Manager, Corporate Finance Division, Ernst & Young, LLP. There he served as leader of the Southwest Region for the firm’s Intellectual Property Solutions Group, marketing IP portfolio management services to Fortune 500 companies. His fields of expertise include the valuation and market analysis of patents, trade names, software, and other intangible assets; and analysis of licensing

and royalty agreements. He has testified as an expert witness in intellectual property litigation cases, and has served as a speaker on intellectual property and financial issues.

Mr. Harrison is also the New York Times best-selling author of six novels, including *Storming Intrepid*, *Thunder of Erebus*, *Black Cipher*, *Forbidden Summit*, *Eurostorm*, and *Longitude Lost*. He has deep personal experience in copyright law and licensing intellectual property within the entertainment industry.

Mr. Harrison holds a B.A. in Journalism and an M.A. in Political Science from Texas A&M University, and an M.B.A. in Finance from Southern Methodist University. Prior to retirement he was certified as a Master Analyst in Financial Forensics. Mr. Harrison's resumé is attached to this disclosure.

Within the past ten years, Mr. Harrison has published two novels, *Eurostorm* (2010) and *Longitude Lost* (2019). During that same period, he has published one short story, *America's Team* (2016). Mr. Harrison has not served as an expert witness either at trial or by deposition in the last four years.

Mr. Harrison will express the following opinions at trial:

- Plaintiff has experienced damages for lost earnings estimated at \$135,000.00 based upon expected pre-orders, sales, and future potential sales;
- Plaintiff has experienced reputational harm to its brand and lost earning capacity in excess of \$250,000.00 directly attributable to the actions of the defendant;
- Plaintiff has experienced damages from lost business or economic opportunities in excess of \$250,000.00 directly attributable to the actions of defendant Rachelle Soto ("Defendant");
- Defendant has unlawfully derived income from her disparagement of Plaintiff's brand in excess of \$100,000.00; and
- Plaintiff is entitled to punitive damages in the maximum amount permitted by law due to the malicious and intentional activities of Defendant.

The facts or data which Mr. Harrison considered in forming his opinions include his review of correspondence and other documents produced in discovery, the DMCA take-down notices filed by Defendant, and the financial data of Plaintiff. Mr. Harrison considered the following key facts in forming his opinions:

- Defendant falsely accused Plaintiff's primary author of plagiarism, damaging pre-orders, sales, and future potential sales;
- Defendant improperly filed DMCA take-down notices, causing Plaintiff's books to be removed from sale;
- Plaintiff has experienced reputational harm to its brand and lost earning capacity in due to Defendant's actions on social media;
- Plaintiff has lost business and economic opportunities due to Defendant's actions on social media and elsewhere in the marketplace;
- Defendant herself has improperly benefitted from her campaign against Plaintiff; and
- Defendant's actions against Plaintiff were malicious, unwarranted, and intentional.

Mr. Harrison has prepared the attached exhibits, which include spreadsheets, to summarize or support his opinions. Mr. Harrison may choose revise these exhibits and/or prepare additional exhibits. If he does, Plaintiff will supplement this disclosure immediately.

For his expert services in this case, including study, preparation, and testimony, Mr. Harrison will be paid an expert fee of \$200.00 per hour, plus travel and other expenses.

Plaintiff reserves its right to supplement the opinions provided by the above-referenced experts.

Reviewed and acknowledged:

A handwritten signature in black ink, appearing to read 'Payne Harrison', is written over a horizontal line.

Payne Harrison May 4, 2020

May 4, 2020

Respectfully submitted,

QUILL INK BOOKS LIMITED

By: /s/ John M. Bredehoft
John M. Bredehoft
Virginia State Bar No. 33602
KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, Virginia 23510
757-624-3000
757-624-3225 (direct)
888-360-9092 (facsimile)
jmbredehoft@kaufcan.com
Counsel for Plaintiff
Quill Ink Books Limited

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

/s/ John M. Bredehoft
John M. Bredehoft
Virginia State Bar No. 33602
KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, Virginia 23510
757-624-3000
757-624-3225 (direct)
888-360-9092 (facsimile)
jmbredehoft@kaufcan.com
Counsel for Plaintiff
Quill Ink Books Limited

PAYNE HARRISON

M.A., M.B.A., M.A.F.F. (Retired)

Litigation Advisory

Deep experience as an expert witness and managing teams in litigation cases involving forensic, valuation, and economic damages issues. These cases have dealt with breach of contract, insurance claims for lost profits, forensic accounting, dissenting shareholders, business interruption, voting & non-voting share values, intellectual property infringement, and minority, closely-held discounts. Have testified at deposition and trial, and clients have included Compaq, Airgas, News Corp., Comerica Bank, Columbia/HCA, DHL, Blockbuster, M-I Drilling Fluids, Komori, Mitsubishi, and the Securities & Exchange Commission. Retired Master Analyst of Financial Forensics, certified in financial litigation.

Experience in Intellectual Property

Partner, The Stirling Group. Independent consulting firm that advised clients regarding intellectual property licensing, litigation advisory, and media relations. Represented Southern Methodist University's school of electronic gaming in the acquisition of intellectual property rights from Paramount Studios for the movie *Braveheart*.

Senior Manager, Corporate Finance Division, Ernst & Young LLP. Leader in the Southwest Region for the firm's Intellectual Property Solutions Group, marketing IP portfolio management services to Fortune 500 companies. Deep experience in the valuation and market analysis of patents, tradenames, software and other intangible assets; including analysis of licensing and royalty agreements. Have testified as an expert witness in intellectual property litigation cases, and have been a speaker on IP/financial issues.

Entertainment Licensing. New York *Times* bestselling author of six thriller novels, including *Storming Intrepid*, *Thunder of Erebus*, *Black Cipher*, *Forbidden Summit*, *EUROSTORM*, and *Longitude Lost*. Experienced in copyright law and licensing intellectual property within the entertainment industry. Novels have been translated and licensed in nine countries.

Media Relations. Former newspaper reporter with a major metropolitan newspaper, and served with the United States Army in Europe as a public affairs officer.

Education

B.A. in journalism and an M.A. in political science from Texas A&M University, and an M.B.A. in finance from Southern Methodist University.

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Exhibit 1: QUILL 003960-003961

Exhibit 2: QUILL 003962-003965

Exhibit 3: QUILL 003966-003968

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FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

QUILL INK BOOKS LIMITED,)	
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Plaintiff/Counterclaim Defendant,)	
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v.)	Civil Action No. 1:19-cv-476-LO-MSN
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RACHELLE SOTO a/k/a ADDISON CAIN,)	
)	
Defendant/Counterclaim Plaintiff.)	

PLAINTIFF’S EXPERT DISCLOSURE – KRISTINA BUSSE

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Quill Ink Books Limited (“Plaintiff”), by counsel, hereby provides the following expert disclosure for Dr. Kristina Busse, an expert witness who will testify on its behalf at the trial of this matter on an issue on which Plaintiff bears the burden of proof:

1. Kristina Busse, Ph.D.
Instructor, Philosophy and Gender Studies, University of South Alabama
344 Humanities Building, Office 124
Mobile, AL 36688

Dr. Busse is a professor at the University of South Alabama teaching in the Department of Philosophy, and has been teaching various forms of literature, literary analysis and literary theory at a university level for nearly twenty-five years.

Dr. Busse holdstwo undergraduate degrees from Johannes Gutenberg-Universität Mainz (Johannes Gutenberg University of Mainz), and both a master’s degree and doctorate in English from Tulane University in New Orleans, Louisiana.

With twenty years spent focused on fan fiction and fan cultures, she has extensive experience with the topic. A direct reflection of this knowledge is seen in the numerous articles, books, and

other works Dr. Busse has authored, as well as the many presentations and conference talks she has given during this period. Dr. Busse's expertise and experience extends specifically to the Omegaverse as well; in fact, she wrote the first academic discussion on the trope of omegaverse fan fiction in 2013. A copy of Dr. Busse's resumé is attached to this disclosure.

Within the past ten years, Dr. Busse has published countless works, including:

- "Canon-compliance and Creative Analysis in Vorkosigan Saga Fan Fiction." *Biology and Manners: The Worlds and Works of Lois McMaster Bujold* Ed. Una McCormack and Regina Yung Lee. Liverpool: Liverpool University Press, 2020.
- "Afterword: Fannish Affect and Its Aftermath." *Everybody Hurts: Transitions, Endings and Resurrections in Fandom*. Ed. Rebecca Williams. Iowa City: University of Iowa Press, 2018. 209–18.
- *Framing Fan Fiction: Literary and Social Practices in Fan Fiction Communities*. Iowa City: University of Iowa Press. 2017.
- "The Ethics of Studying Online Fandoms." *The Routledge Companion to Media Fandom*. Ed. Melissa A. Click and Suzanne Scott. New York: Routledge, 2017. 9–18.
- "A History of Slash Sexualities: Debating Queer Sex, Gay Politics, and Media Fan Cultures." Co-written with Alexis Lothian. *Routledge Companion to Media, Sex, and Sexuality*. Ed. Feona Attwood, R.Danielle Egan, Brian McNair, and Clarissa Smith. London: Routledge, 2017. 117-29.
- "Fan Fiction Tropes as Literary and Cultural Practices." In *Lesen X.0: Rezeptionsprozesse in der digitalen Gegenwart, Reihe digilit. Literatur und Literaturvermittlung im Zeitalter der Digitalisierung*. Ed. Sebastian Bock, Julian Ingelmann, Kai Matuszkiewicz, Friederike Schruhl. Gottingen, Germany: V&R unipress, 2017. 127–43.
- "Queer Sex, Gay Politics, and Media Fan Cultures." Co-written with Alexis Lothian. *Routledge Companion to Media, Sex, and Sexuality*. Ed. Feona Attwood, R.Danielle Egan, Brian McNair, and Clarissa Smith. London: Routledge. 2017. 117–29.
- "Intertextuality, Performativity, and Intimacy in Fan Fiction Communities." *Fandom: Identities and Communities in a Mediated World*. Revised second edition. Ed. Jonathan Gray, Cornel Sandvoss and C. Lee Harrington. New York: NYU Press, 2017. 45–59.
- "Beyond Mary Sue: Fan Representation in Fiction and the Complex Negotiation of Gendered Identity." *Seeing Fans: Seeing Fans: Representations of Fandom in Media and Popular Culture*. Ed. Paul Booth and Lucy Bennett. London: Bloomsbury, 2016. 159–68.

- “Feminism and Fandom Revisited: Fan Labor and Feminism.” In Focus Editor. *Cinema Journal* 54.3 (Summer 2015). 110-55.
- “Fan Labor and Feminism: Capitalizing the Fannish Labor of Love” In *Focus*. Editor. *Cinema Journal* 54.3 (Spring 2015): 110–55.
- “Media Fan Studies: Eine Bestandsaufnahme.” Trans. Vera Cuntz-Leng. *Creative Crowds: Perspektiven der Fanforschung im deutschsprachigen Raum*. Ed. Vera Cuntz-Leng. Darmstadt: Buchner Verlag, 2014. 17–34.
- “Media Fan Studies: Eine Bestandsaufnahme.” Trans. Vera Cuntz-Leng. *Creative Crowds: Perspektiven der Fanforschung im deutschsprachigen Raum*. Ed. Vera Cuntz-Leng. Darmstadt: Büchner Verlag, 2014. 17-34.
- *The Fan Fiction Studies Reader*. Co-edited with Karen Hellekson. Iowa City: University of Iowa Press, 2014.
- "Pon Farr, Mpreg, Bonds, and the Rise of the Omegaverse." *Fic: Why Fanfiction is Taking over the World*. Ed. Anne Jamison. Smart Pop Books, 2013. 288–94.
- “The Return of the Author: Ethos and Identity Politics.” *Companion to Media Authorship*. Ed. Jonathan Gray and Derek Johnson. Oxford: Blackwell, 2013. 48–68.
- “Remixing the Remix: Ownership and Appropriation within Fan Communities.” Co-written with Shannon Farley. *M/C Journal* 16.4 (August 2013).
- “Geek Hierarchies, Boundary Policing, and the Gendering of the Good Fan.” *Participations: Journal of Audience and Reception Studies* 10.1 (May 2013).
- *Sherlock and Transmedia Fandom*. Co-edited with Louisa Ellen Stein. Jefferson, N.C.: McFarland, 2012.
- “Identity, Ethics, and Fan Privacy.” Co-written with Karen Hellekson. *Fan Culture: Theory/Practice*. Ed. Katherine Larsen and Lynn Zubernis. Newcastle: Cambridge Scholars Publishing, 2012. 38–56.
- “Fans and Fan Communities.” Co-Written with Jonathan Gray. *Handbook of Media Audiences* Ed. Virginia Nightingale. Oxford: Blackwell, 2011. 425–43.
- “Scholarly Critiques and Critiques of Scholarship.” Co-written with Alexis Lothian. *Camera Obscura* 77 (26.2) September 2011.

Dr. Busse has not served as an expert witness either at trial or by deposition in the last four years. She was, however, retained as an expert witness and provided testimony, prior to the

case's settlement, in the case styled Quill Ink Books Limited v. ABCD Graphics and Design, Inc., d/b/a Blushing Books Publishing, No. CIV-18-920-G, U.S. District Court for the Western District of Oklahoma (2019).

Dr. Busse will express the following opinions at trial:

- Plaintiff's three published books by Zoey Ellis that are subject to the falsified "take-down" notices filed by defendant Rachelle Soto a/k/a Addison Cain's ("Defendant") publisher, and at her request, under the Digital Millennium Copyright Act ("DMCA") (*Myth of Omega* trilogy) do not plagiarize the Defendant's corresponding works (*Alpha's Claim* trilogy);
- Omegaverse is a well-known and documented genre, which was created within the fan fiction community and contains a number of well-defined tropes; and
- The similarities between the Plaintiff's and Defendant's respective trilogies at issue are generic and merely well-established common tropes for their genre.

The facts or data which Dr. Busse has considered in forming her opinions include her reading of both the *Myth of Omega* and *Alpha's Claim* trilogies; her deep analysis of the similarities and differences between the two trilogies in the context of tropes and genre categories unique to the omegaverse; observations of the operation of fandoms and their self-created archives for categorizing and filtering predictable trope- or genre-based classifications; observations of fan culture; and the history of the birth of common tropes in various fandoms, including omegaverse. Dr. Busse previously summarized her knowledge and opinions regarding similar issues, facts and data in a report, which has also been attached to this disclosure.

Dr. Busse has not yet prepared any exhibits to summarize or support her opinions, and may choose not to do so. If she does, Plaintiff will supplement this disclosure immediately.

For her expert services in this case, including study, preparation, and testimony, Dr. Busse will be paid an expert fee of \$100.00 per hour, plus travel and other expenses.

Plaintiff reserves its right to supplement the opinions provided by the above-referenced expert.

Reviewed and acknowledged:

Signature



Kristina Busse May 4, 2020

May 4, 2020

Respectfully submitted,

QUILL INK BOOKS LIMITED

By: /s/ John M. Bredehoft

John M. Bredehoft
Virginia State Bar No. 33602
KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, Virginia 23510
757-624-3000
757-624-3225 (direct)
888-360-9092 (facsimile)
jmbredehoft@kaufcan.com
Counsel for Plaintiff
Quill Ink Books Limited

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

/s/ John M. Bredehoft

John M. Bredehoft
Virginia State Bar No. 33602
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Counsel for Plaintiff
Quill Ink Books Limited

Kristina Dorothea Busse

kbusse2@gmail.com
kristinabusse.com
(251) 581-2550

Education

PhD in English, May 2002, Tulane University, New Orleans, LA.

Dissertation, "Imagining Auschwitz: Postmodern Representations of the Holocaust."
(Geoffrey Harpham, Advisor)

M.A. in English, December 1993, Tulane University, New Orleans, LA.

Zwischenprüfung in English, February 1991, Johannes-Gutenberg-Universität Mainz, Germany.

Vordiplom in mathematics, October 1990, Johannes-Gutenberg-Universität Mainz, Germany.

Abitur, May 1986, Frauenlobgymnasium Mainz, Germany.

Teaching Experience

University of South Alabama, Department of Philosophy, Instructor, Fall 2006 – Present:

Ethics and the Holocaust	Feminism and Gender Theory
19th and 20th C. Continental Philosophy	Introduction to Logic
Introduction to Ethics	Classic Mythology

University of South Alabama, Gender Studies Program, Instructor, Spring 2014 – Spring 2019:

Feminism and Gender Theory	Gender and Media Reception
Introduction to Gender Studies	Sexuality and Gender 1970s–2010s
Science Fiction and Gender	

University of South Alabama, Department of English, Instructor, Spring 2004 – Spring 2006:

Composition	Survey of British Literature II	Survey of American Literature II
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Alabama School of Mathematics and Science, Instructor, Fall 2001 – Spring 2004

University of South Alabama, Department of English, Instructor, Fall 1998 – Fall 2000

Tulane University, Teaching Fellow, Spring 1995 – Fall 1996

Books and Edited Collections

Slash: Fan Fantasies and the Politics of Desire. Co-written with Alexis Lothian. Under Contract with University of Michigan Press.

Framing Fan Fiction: Literary and Social Practices in Fan Fiction Communities. Iowa City: University of Iowa Press. 2017.

The Fan Fiction Studies Reader. Co-edited with Karen Hellekson. Iowa City: University of Iowa Press, 2014.

Sherlock and Transmedia Fandom. Co-edited with Louisa Ellen Stein. Jefferson, N.C.: McFarland, 2012.

Fan Fiction and Fan Communities in the Age of the Internet. Co-edited with Karen Hellekson. Jefferson, N.C.: McFarland, 2006.

Journal Articles

- “Remixing the Remix: Ownership and Appropriation within Fan Communities.” Co-written with Shannon Farley. *M/C Journal* 16.4 (August 2013).
- “Geek Hierarchies, Boundary Policing, and the Gendering of the Good Fan.” *Participations: Journal of Audience and Reception Studies* 10.1 (May 2013).
- “Limit Play: Fan Authorship between Source Text, Intertext, and Context.” Co-written with Louisa Stein. *Popular Communication* 7.4 (2009): 192–207.
- “Yearning Void and Infinite Potential: Online Slash Fandom as Queer Female Space.” Co-written with Alexis Lothian and Robin Anne Reid. *ELN* 45.2 (Fall/Winter 2007): 103–111.
- “Канон, контекст и консенсус: новое прочтение фанфикшена.” (Canon, Context, and Consensus: An Approach to Reading Fan Fiction.) Trans. Ksenia Prassolova. *Baltic Journal of Philology* 6 (2007): 345–360.
- “Reflecting the Subject: The ‘Return of the Repressed’ in Virginia Woolf’s *Between the Acts*.” *Woolf Studies Annual* 7 (2001): 75–101.

Book Chapters

- “Canon-compliance and Creative Analysis in Vorkosigan Saga Fan Fiction.” *Biology and Manners: The Worlds and Works of Lois McMaster Bujold*. Ed. Una McCormack and Regina Yung Lee. Liverpool University Press. 2020.
- “Afterword: Fannish Affect and Its Aftermath.” *Everybody Hurts: Transitions, Endings and Resurrections in Fandom*. Ed. Rebecca Williams. Iowa City: University of Iowa Press, 2018. 209–18.
- “The Ethics of Studying Online Fandoms.” *The Routledge Companion to Media Fandom*. Ed. Melissa A. Click and Suzanne Scott. New York: Routledge, 2017. 9–18.
- “Fan Fiction Tropes as Literary and Cultural Practices.” In *Lesen X.0: Rezeptionsprozesse in der digitalen Gegenwart, Reihe digilit. Literatur und Literaturvermittlung im Zeitalter der Digitalisierung*. Ed. Sebastian Böck, Julian Ingelmann, Kai Matuszkiewicz, Friederike Schruhl. Göttingen, Germany: V&R unipress, 2017. 127–43.
- “Queer Sex, Gay Politics, and Media Fan Cultures.” Co-written with Alexis Lothian. *Routledge Companion to Media, Sex, and Sexuality*. Ed. Feona Attwood, R.Danielle Egan, Brian McNair, and Clarissa Smith. London: Routledge. 2017. 117–29.
- “Intertextuality, Performativity, and Intimacy in Fan Fiction Communities.” *Fandom: Identities and Communities in a Mediated World*. Revised second edition. Ed. Jonathan Gray, Cornel Sandvoss and C. Lee Harrington. New York: NYU Press, 2017. 45–59.
- “Beyond Mary Sue: Fan Representation in Fiction and the Complex Negotiation of Gendered Identity.” *Seeing Fans: Seeing Fans: Representations of Fandom in Media and Popular Culture*. Ed. Paul Booth and Lucy Bennett. London: Bloomsbury, 2016. 159–68.
- “Media Fan Studies: Eine Bestandsaufnahme.” Trans. Vera Cuntz-Leng. *Creative Crowds: Perspektiven der Fanforschung im deutschsprachigen Raum*. Ed. Vera Cuntz-Leng. Darmstadt: Büchner Verlag, 2014. 17–34.
- “The Return of the Author: Ethos and Identity Politics.” *Companion to Media Authorship*. Ed. Jonathan Gray and Derek Johnson. Oxford: Blackwell, 2013. 48–68.

- “Identity, Ethics, and Fan Privacy.” Co-written with Karen Hellekson. *Fan Culture: Theory/Practice*. Ed. Katherine Larsen and Lynn Zubernis. Newcastle: Cambridge Scholars Publishing, 2012. 38–56.
- “Fans and Fan Communities.” Co-Written with Jonathan Gray. *Handbook of Media Audiences*. Ed. Virginia Nightingale. Oxford: Blackwell, 2011. 425–43.
- “Bending Gender: Feminist and (Trans)Gender Discourses in the Changing Bodies of Slash Fanfiction.” Co-written with Alexis Lothian. *Internet Fiction(s)*. Ed. Ingrid Hotz-Davies, Anton Kirchhofer, and Sirpa Leppänen. Cambridge: Cambridge Scholars Publishing, 2009. 105–27.
- “My Life is a WIP on My LJ: Slashing the Slasher and the Reality of Celebrity and Internet Performances.” *Fan Fiction and Fan Communities in the Age of the Internet*. Ed. Kristina Busse and Karen Hellekson. Jefferson, N.C.: McFarland, 2006. 207–24.
- “‘I’m Jealous of the Fake Me’: Postmodern Subjectivity and Identity Construction in Boy Band Fan Fiction.” *Framing Celebrity: New Directions in Celebrity Culture*. Ed. Su Holmes and Sean Redmond. London: Routledge, 2006. 253–67.
- “‘Digital Get Down’: Postmodern Boy Band Slash and the Queer Female Space” *eros.usa: Essays on the Culture and Literature of Desire*. Ed. Cheryl Malcolm and Jopi Nyman. Gdansk: Gdansk UP, 2005. 104–25.
- “Crossing the Final Taboo: Family, Sexuality, and Incest in the Buffyverse.” *Fighting the Forces: What’s at Stake in Buffy the Vampire Slayer?* Ed. Rhonda V. Wilcox and David Lavery. Lanham: Rowman & Littlefield, 2002. 207–17.

Selected Other Publications

- “Fan Labor and Feminism: Capitalizing the Fannish Labor of Love” *In Focus*. Editor. *Cinema Journal* 54.3 (Spring 2015): 110–55.
- “Pon Farr, Mpreg, Bonds, and the Rise of the Omegaverse.” *Fic: Why Fanfiction is Taking over the World*. Ed. Anne Jamison. Smart Pop Books, 2013. 288–94.
- “Scholarly Critiques and Critiques of Scholarship.” Co-written with Alexis Lothian. *Camera Obscura* 77 (September 2011): 139–46.
- “Fandom and Feminism: Gender and the Politics of Fan Production.” *In Focus*. Editor. *Cinema Journal* 48.4 (Fall 2009): 104–136.
- “Fans, Fandom, Fan Studies.” *Encyclopedia of Communication Theory*. Ed. Stephen Littlejohn and Karen Foss. Thousand Oaks: Sage, 2009. 385–90.
- “Fan Fiction” and “Slash” *Women in Science Fiction and Fantasy: An Encyclopedia*. Ed. Robin Reid. Westport, CT: Greenwood. 111–13, 280–82.
- “The Holocaust and Modernity.” *History in Dispute: The Holocaust, 1933-1945*. Ed. Tandy McConnell. History in Dispute, Vol. 11. Detroit: Gale, 2003. 75–78.
- “Holocaust Literature and its Ethical Limitations.” *History in Dispute: The Holocaust, 1933-1945*. Ed. Tandy McConnell. History in Dispute, Vol. 11. Detroit: Gale, 2003. 50–54.

Invited Talks

- “Feminist Open Access and Internet Publishing.” Invited Speaker. *History and Theory of New Media lecture series*. March 12, 2020 at University of California, Berkeley, CA.
- “Fan Works as Reader Response Theory.” Invited Speaker. *Dimensionen des Lesens*. November 6–8, 2019 in Hannover, Germany.
- “Framing Fan Fiction: Archival Infrastructure as Consent Negotiations.” Keynote Speaker, *Kino Club 313 Conference*. February 17–18, 2017 at Wayne State University, MI.
- “Fan Fiction Tropes as Literary and Cultural Practices.” Invited Speaker. *#Lesen. Transformationen traditioneller Rezeptionskonzepte im digitalen Zeitalter*. September 29–October 1, 2016 in Göttingen, Germany.
- “Of Mice and Mutants: Competitive Memories and Minority Identity in Holocaust Comics.” Invited Speaker. *Holocaust in Memory and History*. September 7, 2016 in Mobile, AL.
- “Syntax and Semantics of Tags as Genre Markers.” Keynote Speaker. *MASH 2013: Making and Sharing*. July 4–5, 2013 in Maastricht, The Netherlands.
- “Fifty Shades of Fandom: Repetition and Originality in Transformative Fanworks.” Keynote Speaker. *Borders and Beyond: Considering Communities*. Oct 11–13, 2012 in Gainesville, FL.
- “Affect and the Individual Fan.” Keynote Speaker. *Cyber Echoes*. Feb 11–13, 2010 in Umeå, Sweden.
- “The Role of Genre and Tropes in Writer Creativity and Reader Engagement.” Invited Speaker. *WriterCon: Writing Between the Lines*. July 31–Aug 2, 2009 in Minneapolis.

Selected Conference Papers

- “Fan Fiction as Historiographic Storytelling.” *Fan Studies Network: North America*. October 24–26, 2019 in Chicago, IL.
- “Slash Fandom/Sex Wars: Feminist Conflict and the Politics of Fantasy.” *Fan Studies Network: North America*. October 25–28, 2018 in Chicago, IL.
- “Teaching with Fan Video: Pedagogies and Classroom Strategies.” Workshop, Chair. *SCMS*. March 21–26, 2017 in Chicago, IL.
- “Community, Fiction, and Reality: Real People Fiction as Historiography.” *SCMS*. March 30–April 3, 2016 in Atlanta, GA.
- “Complex Negotiation of National Identity in *The Americans*.” *Flow*. Sept 11–13, 2014 in Austin, TX.
- “The Return of the Author: Ethos and Identity Politics.” *SCMS*. March 6–10, 2013 in Chicago, IL.
- “I Don’t Hate the South: Familial Blood and the Southern Vampire in *True Blood* and *The Vampire Diaries*.” *SCMS*. March 21–25, 2012 in Boston, MA.
- “Second Lining as Suffering and Solidarity: Absence and Authenticity in David Simon’s post-Katrina New Orleans.” *SCMS*. March 11–13, 2011 in New Orleans, LA.
- “Original Genius and Transformative Repetition.” *IP/Gender: Mapping the Connections*. April 23–24, 2009 in Washington, DC.
- “Intense Intertextuality: Derivative Works in Context.” *Media in Transition*. April 27–29, 2007 in Cambridge, MA.
- “Negotiating Authority in Harry Potter Fan Fiction.” *International Conference on the Fantastic in the Arts*. March 24–28, 2004, in Ft. Lauderdale, FL.

“Walter Abish’s *How German Is It*: Forgetting the Trauma/Re-Covering the Past.” *International Conference on Narrative*. March 8–10, 2001 in Houston, TX.

“Postmodern Ethics/Postmodern Aesthetics: Reading Bernhard Schlink’s *The Reader*.” *International Conference on Narrative*. April 6–9, 2000 in Atlanta, GA.

“Imagining the Future to Rethink the Past: Raymond Federman’s *Twofold Vibration* as Holocaust Science Fiction.” *Science Fiction Research Association*. June 2–6, 1999 in Mobile, AL.

“Holocaust as Postmodern Trauma: Representing the Real in D. M. Thomas’s *The White Hotel*.” *International Conference on Narrative*. April 3–6, 1997 in Gainesville, FL.

“Reflecting the Subject: The ‘Return of the Repressed’ in Virginia Woolf’s *Between the Acts*.” *Sixth Annual Virginia Woolf Conference*. June 13–16, 1996 in Clemson, SC.

“‘I’ve got a bad wife in the house’: Competing Discourses of Nationalism, Gender, and Religion in J. M. Synge’s *Shadow of the Glen*.” *American Conference for Irish Studies*. April 16–18, 1995 in Charleston, SC.

Editorial and Professional Experience

Organizer. *Fan Studies Salon*. University of Southern California, February 2018; February 2019.

Organizer. *Fan Studies Network North America*. DePaul University, October 25–27, 2018.

Editorial Board. *Cinema Journal*. 2015–present.

Founding Editor. *Transformative Works and Cultures* (international peer-reviewed academic journal). 2007–present.

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Discussion of Addison Cain's *Alpha's Claim*, and Zoey Ellis's *Myth of Omega*

The two series in question encompass three books each. Addison Cain's *Alpha's Claim* (AC) trilogy features *Born to be Bound*, *Born to Be Broken*, and *Reborn* (Blushings Books 2016). Zoey Ellis's *Myth of Omega* (MoO) features *Crave to Conquer*, *Crave to Capture*, and *Crave to Claim* (Createspace 2018). On the reader-driven social networking book review site GoodReads.com, both series are tagged by readers under Fantasy, Paranormal, Dark, Romance, Adult Fiction, Erotica, and Omegaverse. On Amazon.com's Kindle Store, both *Born to Be Broken* and *Crave to Conquer* appear on the first page of a search for "omegaverse." In the paratextual material, both series are described as dark, sexually explicit omegaverses, only differing slightly in their emphasis on complete power exchange (in Cain's case) and traditional romance (in Ellis's):

... Addison Cain's exciting, raw, and suspense-filled Omegaverse series is a dark tale with explicit sexual themes and complete power exchange. Though situations may be interpreted as romantic, this is a... not a standard romance. [Alpha's Claim]

Myth of Omega serial [is] a dark, erotic, Omegaverse romance. ... [It] is an explicit reading experience from sexual scenes to violence and language. Includes disturbing situations and romance of a dark nature. [Myth of Omega]

Any question as to how closely the two series resemble one another in terms of plot, setting, characterization, and diction must be understood within the contexts of the specific genres and tropes in which these books position themselves and are positioned by their readers. Counsel asked me to read the six books in question and situate them within the genre categories and accompanying tropes of (Dark) Romance and Omegaverse in particular. Genre theory is a theoretical approach that looks at the creation and use of genre in terms of production, dissemination, and reception as well as an interpretive tool. Tropes are used here not in the meaning of rhetorical figures of speech but rather as a recurrent theme and conceptual narrative shorthand that often function as a subgenre.

MY BACKGROUND

I have a Ph.D. in English from Tulane University (2002) and have been teaching various forms of literature, literary analysis, literary theory, and gender studies at the university level for nearly 25 years. I currently teach in the Department of Philosophy and the Department of Gender Studies at the University of South Alabama. My primary research focus for more than 15 years has been fan fiction and fan communities. Most generally, fan fiction is the fictional extrapolation of an established universe. Such a broad definition would include many literary texts from Virgil's *Aeneid*, in which he takes a minor character from the *Illiad* and *Odyssey* and fashions him into the hero of his own epic to Tom Stoppard's *Rosencrantz and Guildenstern Are Dead* (1966), in which the comic relief from Shakespeare's *Hamlet* get to have their own adventures. More conventionally, fan fiction tends to describe not any derivative work but instead the amateur works of fans of commercially owned intellectual properties, in particular genre TV shows such as science fiction and police procedurals. Often its history is seen to start in the late 1960s with the first narrative responses to *Star Trek: The Original Series* in self-published and distributed fan zines. The rise of the Internet, facilitated fan communication and fan fiction dissemination, and by now fans can easily access and share fan stories in a variety of online forums and archives.

I have published more than 20 essays on the topic in peer-reviewed journals and essay collections. I am co-editor of three essay collections on fan fiction and author of one monograph that connects literary and social aspects of fan fiction.¹ I am founding editor of *Transformative Works and Cultures* (2008–), the first international peer-reviewed fan studies journal and have been primary reader on all submissions for the past decade. In 2013 I wrote the first academic discussion on the trope of omegaverse fan fiction.² In it I studied the various tropes and influences that led to the rise of literary subgenre that had recently become popular in a variety of fandoms called Alpha/Beta/Omega Dynamic, A/B/O, or omegaverse. My current interest continues to be the historical development of fan fiction genres and tropes with a particular focus on influences between different fandoms and on tropes that seem to arise from fannish conventions and not outside cultural influences. I am co-authoring a book that has chapters on mind and soul bonds, on BDSM societies, and on Alpha/Beta/Omega Dynamics, all of which are widely shared popular tropes within fan fiction communities on and offline.

GENRE AND TROPES

Reading the two trilogies within this context, it is obvious that both follow a number of characteristics that have become popularized under the shorthand omegaverse. In fact, though

1 Kristina Busse. 2017. *Framing Fan Fiction: Literary and Social Practices in Fan Fiction Communities*. Iowa City: University of Iowa Press. Karen Hellekson and Kristina Busse, ed. 2014. *The Fan Fiction Studies Reader*. Iowa City: University of Iowa Press. Louisa Ellen Stein and Kristina Busse, ed. 2012. *Sherlock and Transmedia Fandom*. Jefferson, N.C.: McFarland. Karen Hellekson and Kristina Busse, ed. 2006. *Fan Fiction and Fan Communities in the Age of the Internet*. Jefferson, N.C.: McFarland.

2 Kristina Busse. 2013. "Pon Farr, Mpreg, Bonds, and the Rise of the Omegaverse." In Anne Jamison, ed., *Fic: Why Fanfiction is Taking over the World*, 288–94. Dallas, TX: BenBella.

neither of the authors articulates a direct dialogue with fan fiction communities, the similarities suggest that they are familiar with fannish incarnations of the omegaverse or any of the widely published summaries and theoretical pieces that describe and explain the genre. The omegaverse genre was coined as (and now defines) a shorthand among readers and writers to describe a shared understandings of a group of associated tropes.

Genres and tropes are literary categories that often follow the “I know it when I see it” model. While structuralist critics have long tried to create a taxonomy of literary, film, and TV genres where genre boundaries are clearly delineated,³ most current genre theorists discount such attempts.⁴ In its stead, they view genre categories as “constituted by cultural discursive practices of definition, interpretation, and evaluation”;⁵ in other words, authors and readers/viewers collaborate within a given cultural context in the ever-changing and ever-evolving process of defining genres and labelling texts. While this is true for any medium and genre, it is particularly apparent within fan fiction, where writers and readers occupy the same online spaces and where many fan-created norms actively invite genre and trope labelling.

The fan-created and fan-run central fan fiction archive, Archive of Our Own (AO3), for example, has a complex tagging system of shared metatextual markers. These tags illustrate how communities define their own taxonomies to advertise stories as well as warn for certain contents. What is important to note here is that tags indeed function (maybe even primarily) as advertisement, i.e., the existence of the tags Romance, Sexual Content, or Alpha/Beta/Omega Dynamics on the AO3 allows readers to filter stories so they will only see those tagged.⁶ Moreover, it is important to note that fan fiction readers (and, I’d argue, genre readers in general, including romance readers) search actively for generic tropes in their reading. Many of the most read and commented stories seem to be highly generic and quite predictable with that familiarity being their primary appeal.⁷ In other words, they are popular and beloved not in spite but because of their narrative predictability.

3 See Rick Altman. 1999. *Film/Genre*. British Film Institute. London: BFI Press. John Cawelti. 1976. *Adventure, Mystery and Romance. Formula Stories as Art and Popular Culture*. Chicago: University of Chicago Press. Tzvetan Todorov. 1975. *The Fantastic. A Structural Approach to a Literary Genre*. Ithaca: Cornell University Press. Vladimir Propp. 1968. *The Morphology of the Folktale*. Austin: University of Texas Press.

4 See Jason Mittell. 2004. *Genre and Television: From Cop Shows to Cartoons in American Culture*. New York: Routledge. Louisa Stein. 2006. “Fantastic Teen TV: Transgenericism, Television, and Online Reception.” PhD diss., New York University.

5 Louisa Ellen Stein. 2008. “‘Emotions-Only’ versus ‘Special People’: Genre in Fan Discourse.” *Transformative Works and Cultures*, no. 1. <http://dx.doi.org/10.3983/twc.2008.0043>.

6 “Tags.” *Archive of Our Own*. <https://archiveofourown.org/tags>.

7 See Louisa Stein and Kristina Busse. 2009. “Limit Play: Fan Authorship between Source Text, Intertext, and Context.” *Popular Communication* 7.4: 192–207. Kristina Busse. 2017. “Fan Fiction Tropes as Literary and Cultural Practices.” In Sebastian Böck, Julian Ingelmann, Kai Matuszkiewicz, and Friederike Schruhl, ed., *Lesen X.0: Rezeptionsprozesse in der digitalen Gegenwart*, 127–43. Göttingen, Germany: V&R unipress.

These observations on reading patterns and tag searching patterns are important, not only because fan fiction has been the origin of the concept, term, and generic trope of Alpha/Beta/Omega Dynamics (A/B/O) and omegaverse, but also because there exist huge similarities between fan fiction and romance readers.⁸ Whereas most literary theory dismisses genre fiction because of its formulaic plots, limited range of characters, and lack of originality, it is these very aspects of the familiar without unpleasant surprises that appeal to many genre readers. In an early study of romance readers, for example, Janice Radway describes their implicit understanding of genre rules: readers “exhibit fairly rigid expectations about what is permissible [...] and express disappointment and outrage when those convention sare violated.”⁹

The existence of the industry standard abbreviations for the ending of books with Happily Ever After (HEA) and Happy For Now (HFN) indicate that romance readers actively want information on the ending of the book and often reject books that do not fulfill their clear expectations. This is true not only for endings but also for many other aspects of the novels, including plot arcs themselves. Publishers divide their offerings into ever narrower categories and expect authors to follow very specific guidelines when submitting new books.¹⁰ For readers, knowing the exact genre categories and potential tropes involved is a good indicator as to whether a book may fulfill their expectations and, as a result, whether they may enjoy the book.

OMEGaverse

Omegaverse (or A/B/O or Alpha/Beta/Omega Dynamics, as its slightly broader category is called) is less a well defined genre as it is a collection of related tropes that tend to correlate in many stories. Alpha/Beta/Omega defines stories in which humans are not only categorized by gender but also by a second dynamic, namely whether they present as alphas (dominant, physically large, quick-tempered, natural leader) or omegas (submissive, delicate, calm, peace maker), with an undetermined number of humans being default betas. Kristina Busse describes omegaverse as a “perfect storm” of a number of popular fan fiction (and romance) tropes,¹¹

⁸ See Katherine Morrissey 2008. “Fanning the Flames of Romance: An Exploration of Fan Fiction and the Romance Novel.” M.A. Thesis, Georgetown University.

⁹ Janet Radway. 1984. *Reading the Romance: Women, Patriarchy, and Popular Literature*. Chapel Hill: University of North Carolina Press. 63. See also Tania Modleski. 1982. *Loving with a Vengeance: Mass Produced Fantasies for Women*. London: Routledge. Ramsdell, Kristin. 1999. *Romance Fiction: A Guide to the Genre*. Santa Barbara, CA: Libraries Unlimited. Pamela Regis. 2003. *A Natural History of the Novel*. Philadelphia: University of Pennsylvania Press. Katherine Morrissey. 2016. “Romance Networks: Aspiration and Desire in Today’s Digital Culture.” Ph.D. Thesis, University of Wisconsin-Milwaukee.

¹⁰ For a discussion on “the romance industry’s own discussion of what constitutes a successful romance novel,” see An Goris. 2012. “Loving by the Book: Voice and Romance Authorship.” In Sarah S. G. Frantz and Eric Murphy Selinger, ed., *New Approaches to Popular Romance Fiction*, 77–83. Jefferson, N.C.: McFarland. For a discussion of the industrial impact of digital publishing on erotic romance, see Katherine E. Morrissey. 2015. “Steamy, Spicy, Sensual: Tracing the Cycles of Erotic Romance.” In Kristen Phillips, ed., *Women and Erotic Fiction: Critical Essays on Genres, Markets, and Readers*, 42–58. Jefferson, N.C.: McFarland.

¹¹ Busse 2013, 293. *Supra*.

including shifters (especially werewolves), soulmates, breeding and hypersexuality, empathic or telepathic bonds, and biologically deterministic hierarchical societies.

Fan author Nora Bombay begins her “Alphas, Betas, Omegas: A Primer” with the disclaimer that “omegaverses ... are a shared idea, interpreted differently by each author.”¹² As a term of folksonomy (rather than taxonomy), it is collectively created and used by fans, who are at liberty to include or exclude any aspect they like. However, in order to be recognized as an omegaverse, at least some of a vast number of potential characteristics need to be present. These include

- * omega heat cycles and alpha rut
(a biologic necessity to procreate taken directly from animals)
- * scenting
(pheromones are excessive for alphas and omegas often displaying their moods but are excessive during heat where they can often heat can smell their prospective partner)
- * imprinting
(mythology within omegaverses often assumes that there are true alpha/omega mate pairings, a perfect love match, and the alpha often imprints on his mate)
- * claiming bite
(Often assert their dominance the alpha bites the omega during intercourse)
- * mate bonding
(a permanent bond between the partners, often as a result of imprinting and claiming bite)
- * knotting
(a swelling at the base of the penis found in canines after ejaculation that forces the penis to stay inside to ensure impregnation, for alphas it tends to enlarge their already supersized penis)
- * mpreg
(male pregnancy in which omega may have altered sexual organs allowing him to become impregnated by an alpha)

In addition there are commonly used terms and ideas, such as nesting, the need to prepare a place for heat and conception), heat suppressants (often used to hide one’s omega status or simply to not have to deal with heats), and omega sanctuaries (a place where omegas may experience their heat without the intrusion of alphas). It is important that not every story must use all the characteristics so that two stories tagged as A/B/O Dynamics may share little in common. One A/B/O story may be a short pornographic account of a male omega, whose suppressants fail him, whereupon he going into heat, releasing pheromones and becoming senseless. A male alpha scents the omega, is driven wild and goes into rut, knotting and impregnating the omega. Another story might feature a world in which omegas are cherished and their first heat cycle

12 Nora Bombay. 2013–15. “Alphas, Betas, Omegas: A Primer.” *Archive of Our Own*.
<https://archiveofourown.org/works/403644>.

outside of the sanctuary is a coming of age. At a choosing ceremony the alpha imprints, takes the omega to nest, then he mates, knots, claims by bite, and soul bonds.

By most accounts created as a specific trope in 2010/11 and named in late 2011, A/B/O started in an anonymous fan fiction community for the TV show *Supernatural* and quickly became popular enough to become a named and recognizable trope.¹³ Within two years, the trope had spread to dozens of other fandoms and grown to a substantially sized trope.¹⁴ On the multi-fandom archive *Archive of Our Own*, for example, by 2013 about 2,000 stories were tagged Alpha/Beta/Omega Dynamic (though that number dwarves when compared to the more than 40,000 works tagged 5 years later).¹⁵ Fan statistician Destinationtoast, who gathered Omegaverse statistics for *Archive of Our Own* in 2013, shows that about 10% of these are labelled male/female, and netweight's 2013 omegaverse time line lists a June 13, 2011 story as the first male/female story that followed clear omegaverse tropes and terminology.¹⁶ *Archive of our Own* hosts several longer omegaverse stories with alpha males and omega female 2012,¹⁷ and several novel-lengths stories by 2014.¹⁸ In fact, 2014 mainstream feminist blogging site *Jezebel* already features an article explaining omegaverse to its readers.¹⁹

The quick dissemination of omegaverse across most popular fan fiction fandoms helped spread the popularity of omegaverse to male/male commercial romances (often written by fan fiction authors). Meanwhile, some established male/female commercial romance tropes grew in popularity in the 2000s included that of the shifter (often werewolves, such as Patricia Briggs' Alpha and Omega Series [2007–15]) and that of the hypermasculine Alpha hero, which romance writer Doreen Owens Malek describes as a “strong, dominant, aggressive male brought to the point of surrender by a woman.”²⁰

13 See “Alpha/Beta/Omega.” 2012–. Wiki Entry. *Fanlore*. <https://fanlore.org/wiki/Alpha/Beta/Omega>. Netweight. 2013. “The nonnies made them do it!” *Archive of Our Own*. <https://archiveofourown.org/works/1022303>.

14 Destinationtoast. 2013. “It’s Time for Fandom Stats: Omegaverse edition in.” Blog entry. *Tumblr*. <http://destinationtoast.tumblr.com/post/59371807212/its-time-for-fandom-stats-omegaverse-edition-in>.

15 See *Archive of Our Own*. https://archiveofourown.org/tags/Alpha*s*Beta*s*Omega%20Dynamics/works.

16 Tebtosca. 2012. Just Keep Breathing With Me.” *Livejournal*. <https://tebtosca.livejournal.com/20794.html>.

17 Tristesses. 2012. “All Reason Aside, I Just Can’t Deny.” *Archive of Our Own*. <https://archiveofourown.org/works/583600>. Hotchoco195. 2013. “Strangers and Soulmates.” *Archive of Our Own*. <https://archiveofourown.org/works/605274>.

18 Rector. 2014. The Encounter Series. *Archive of Our Own*. <https://archiveofourown.org/series/106793>. KristinStone. 2015–. Living and Breathing in Flint Series. *Archive of Our Own*. <https://archiveofourown.org/series/618040>.

19 Mark Shrayber. “‘Knotting’ Is the Weird Fanfic Sex Trend That Cannot Be Unseen.” *Jezebel*. June 18. <https://jezebel.com/knotting-is-the-weird-fanfic-sex-trend-that-cannot-be-u-1606931767>.

20 Doreen Owens Malek. 1992. “Mad, Bad, and Dangerous to Know: The Hero as Challenge.” In Jayne Ann Krentz, ed. *Dangerous Men and Adventurous Women: Romance Writers on the Appeal of the Romance*. University of Pennsylvania Press. 74.

COMPARISON BETWEEN THE TWO SERIES

In order to compare the two series and to respond to the allegation of plagiarism or in the context of plagiarism, it is important to find similarities above and beyond the characteristics mandated by genre. As **Male/Female Fantasy Omegaverse Dark Romance** stories, both contain a large number of similarities that are already determined by their various genre categories. In fact, the similarities found between the two series lie exhaustively in their generic similarities.

I. Setting

As fantasy novels, both novels are expected to feature elements beyond our contemporary worlds, though the particular setting of the two series is quite different. As omegaverses the societies of AC and MoO both are structured as hierarchical cultures, in which omegas are rare and segregated (justified as protection). This is a fairly common setup for omegaverses, which authors often use to explore intrinsic gender imbalances.²¹

The fantasy world in AC follows the trope of a futuristic dystopia, in which the society lives in domes on an unspecified Earth after a cataclysmic event and, on top of that, deals with the aftermath of a biological plague. The novel is set in one of the domes shortly after the successful prisoner revolution spearheaded by the main alpha protagonist. Omegas are common in this world, but the recent social upheavals have created chaos ripe for abuse and exploitation of the physically weaker.

MoO is set in an undetermined fantasy setting inhabited by warring aristocratic factions. Omegas are a myth in this world and haven't been seen by the public in more than a century. After having conquered large parts of the known world, the alpha main protagonist is looking to solve the omega mystery. Magic (called "Talent") is known in the world though feared and forbidden by the alpha hero.

II. Characters

As marketed romance novels, both series are expected to feature a main heterosexual pairing. omegaverse. Both alpha male anti-heroes command over a military structure of alphas, ruling over a dystopian futurist rebellion of prisoners in AC and an expansionist quasi-medieval society in MoO.

In both series, the omega women use suppressants/blocks to hide their pheromones. In AC the omega uses chemicals and dresses in smelly clothes in order to approach the alpha male to ask him for food for her fellow omegas in hiding after the rebellion. In MoO the omega blocks sensory responses on both sides via magic in order to access the library that houses information

21 Elliot Aaron Director. 2017. "Something Queer in his Make-Up: Genderbending, Omegaverses, and Fandom's Discontents." Ph.D. Thesis, Bowling Green State University. Marianne Gunderson. 2017. "Rewriting Sex and Gender in Omegaverse Fanfiction." M.A. Thesis, University of Oslo, Blindern, Norway. Milena Popova. 2018. "Dogfuck Rapeworld: Omegaverse Fanfiction as a Critical Tool in Analyzing the Impact of Social Power Structures on Intimate Relationships and Sexual Consent." *Porn Studies* 5(2): 175–91.

on the disappearance of omegas for the past century. These precautions fail as they often do in omega stories to get the plot going, and the alpha protagonists scent them and realize they are in heat and remove them from the other alphas. (In AC the hero has to fight and kill a number of competitors whereas in MoO the status of the alpha hero allows him to segregate her from the rest of the castle.)

Both alphas eventually claim the omegas by force and knot them; both omegas fight both the alphas and their own biological desires; in both stories the omegas nest and the alphas purr. All of these tropes are tropes that often and repeatedly occur in omegaverse stories. And yet the time lines are quite different as are the specific encounters. Whereas the biological imperatives attributed to both alphas and omegas is fairly common for omegaverse fiction, it is the specific implementations that distinguishes one story from another.

In AC, the first, quite violent encounter occurs within the first chapter, followed by a prolonged imprisonment of the omega during which she nests. The alpha claims the omega by biting her, and establishing the bond forcibly. Thereafter, the omega describes repeatedly the psychological pull of that bond. In contrast, MoO follows more traditional romance tropes by letting the central pair spar verbally for several chapters. Once the omega's blocks fail and the alpha removes her, she creates a magical barrier and waits out her heat. Only toward the end of her heat (called Haze in the series) do the barriers fail and the alpha claims and knots her. While MoO's central alpha/omega pairing will eventually bond and procreate, it is a decision that is much delayed.

Both alphas are exceptionally possessive of their omegas and hostile to other alphas, which is a common feature in omegaverse fiction. Both are morally ambiguous as Dark Romance heroes, and only slowly are revealed as more emotionally appealing characters to readers and the heroines. In AC a lot of the alpha's behavior is explained by his past. In contrast, MoO's alpha hero is mostly conflicted by the competing drives of his warrior and his alpha instincts that he does not understand. Unlike AC, MoO switches points of view every chapter, so that the reader is more aware of the alpha's feelings and reasoning. AC, on the other hand, places the reader at first fully in the position of the omega female, trying to decipher the alpha's actions.

A more important distinction between the two trilogies, however, is the dynamic between the central pairing. While both couples start out hostile and eventually give in emotionally to their biological connection, AC has a much steadier development toward that goal with both characters slowly and repeatedly reconsidering their positions. MoO's central characters, on the other hand, truly hate one another for the majority of the novels as their political struggles often have to take precedence over their relationship. Likewise, the emotional obstacles function differently in both texts with AC's complication of the alpha's original love who continues to boycott the pair's potential love.

III. Plot

Both series are trilogies featuring one central pairing, so it can be expected that there are a number of obstacles before they get together and both admit their love for one another. While

most novels require some form of complication to develop a plot, not all romance fiction finds that complication within the love story itself. The obstacle could be external (shipwreck, going bankrupt, war,...) with the central love pairing strangers or already friends. However, the enemy-to-lovers trope is one of the more popular ones in romance fiction, allowing for an internal narrative thrust in which both need to overcome their resentments and discover their similarities and love for one another. Whether Beatrice & Benedick in Shakespeare's *Much Ado About Nothing*, Elizabeth Bennett & Mr. Darcy in *Pride and Prejudice*, Scarlett O'Hara & Rhett Butler in *Gone With the Wind* or *The Shop Around the Corner* (1940)/*You've Got Mail* (1998).

As dark romance, both novels clearly share a dynamic in which the central pairing begins with a contentious if not hostile relationship. Moreover, the dark romance trope also already posits the main male character as an anti-hero, often powerful and outlaw but usually with a sense of inner moral compass, which the heroine will ultimately recognize and which will lead to her accepting her feelings for him. AC and MoO share a variety of scenarios that are fairly common in omegaverse stories. Given that emotional attachment and physical attraction are often not in sync, many scenes in omegaverse fiction will explore the omega (but sometimes also the alpha) battling nature versus nature, mind versus body. Ultimately, however, the biological imperative of mating and bonding will win out, a central aspect of the omegaverse trope. Beyond that internal obstacle of trying to come to terms with the facts of their meant-to-be-ness, their true mate-ness, there are external obstacles of the post-revolution (AC) and warring kingdoms (MoO) settings, respectively. Like much romance, these battles, injuries, misunderstandings, escapes, kidnappings, ultimately serve to impede the true goal of the novels, namely the acceptance of both mates that they are meant to be together and their eventual happily ever after.

Several typical omegaverse plot points occur in both trilogies, but the different setting and, even more so, the extremely different pacing make the two novels quite distinct reading experiences. More importantly, the plot against which the alpha/omega reconciliation plays out differs substantially in small and large aspects. For example, in AC the main omega fights an often lonely battle against the alpha's army and the series ends with the alpha in a standoff with the government he had initially overthrown. MoO's central plot has the alpha fighting against another kingdom and then against a long-term omega conspiracy that has deceived everyone in an attempt to protect omegas. The series ends with the happy couple about to become parents again and overseeing their kingdom.

Finally, Cain's series puts a strong emphasis on nonconsensuality and power exchange, which tilts the overall tone: sexual encounters (often not quite consensual) are extensive and frequent in AC. (Also, they are not always tempered by the alpha's regret as in MoO, where the point of view shifts allow us to see the assailant's immediate regret). The role of the bond is different as well: where AC focuses a lot on the animalistic and physical nature of the bond (such as the fact of the omega feeling the alpha in her mind after he bonds her against her will), MoO uses an interpretation of the soul bond that balances physicality with emotion and must be bilateral to function properly. There is also less focus on monogamous exclusivity in AC, where the alpha male has sex with another woman in front of his omega. Finally, AC focuses heavily on its dark

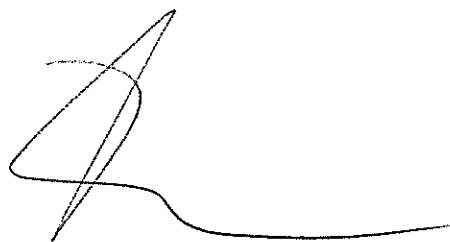
genre aspects: the omega loses her child towards the end of the series and a potential happy ending is delayed beyond the third book.

CONCLUSION

Clearly, any similarities between AC and MoO in terms of setting, characterization, and plot must be understood within the contexts of the specific genres and tropes in which these books position themselves and are positioned by their readers. When choosing a book to read, readers are guided by paratextual material, reviews, and genre tags and the tropes associated with them. These together establish a reader/writer contract that allows the reader to anticipate various aspects of the book in broad outlines, an aspect that is of vital importance for genre readers. Rather than wanting to be surprised, genre readers want to know in broad strokes what will happen in a novel and return to a familiar author, named series, or labelled genre for the explicit purpose to read what they signed up (and paid) to read. In order to establish and control those expectations, however, authors, publishers, book sellers, reviewers, and readers collaborate in creating genre categories and generic tropes to have a clearly shared vocabulary. And if an experienced reader decides to read a Male/Female Fantasy Omegaverse Dark Romance, they should expect something quite like Addison Cain's *Alpha's Claim* or Zoey Ellis's *Myth of Omega*. Because both series play out the very tropes a dark omegaverse romance should contain. After having read hundreds of Alpha/Beta/Omega stories and thousands of stories that employ a subset of of omegaverse's myriad tropes, both series satisfyingly fulfilled my expectations set as they were by their genre tags and metatextual description and summaries.

Sincerely,

Kristina Busse

A handwritten signature in black ink, consisting of a stylized, cursive 'K' followed by a long, horizontal, slightly wavy line extending to the right.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

QUILL INK BOOKS LIMITED,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	
v.)	Civil Action No. 1:19-cv-476-LO-MSN
)	
RACHELLE SOTO a/k/a ADDISON CAIN,)	
)	
Defendant/Counterclaim Plaintiff.)	

PLAINTIFF’S EXPERT DISCLOSURE – STEVEN THRASHER

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Quill Ink Books Limited (“Plaintiff”), by counsel, hereby provides the following expert disclosure for Steven Thrasher, an expert witness under Federal Rules of Evidence 703 and 705 who will testify on its behalf at the trial of this matter on an issue on which Plaintiff bears the burden of proof:

1. Steven Thrasher
P.O. Box 833340
Richardson, TX 75083

Mr. Thrasher currently maintains his own private law and consulting practice, Thrasher Associates, which assists clients with issues regarding intellectual property licensing, trademarks, copyrights and patents, among others. He frequently prepares, files and reviews intellectual property documents, agreements and other related contracts. Prior to founding Thrasher Associates, Mr. Thrasher was an associate at Jackson Waller, Jenkins and Gilchrist, and Griggs, Robinson, Post, Henderson and Smith. In addition to serving as an expert witness in intellectual property cases which involved patent, trademark and copyright matters, Mr. Thrasher has also served as a presenter on intellectual property, marketing and software issues through, among other venues, the MIT Enterprise Forum of Dallas, Texas.

Mr. Thrasher has been deeply engaged in various ventures, both in his capacity as the founder or member of companies engaged in licensing technology, automation, software, and other intellectual property-based industries. He is an inventor of several patented technologies, with additional patents pending, and co-authored chapters on software copyrights and the Digital Millennium Copyright Act in the *E-Copyright Practice Manual*, published by Aspen Publishing (2002).

Mr. Thrasher holds a B.S. in Electrical Engineering and a B.S. in Finance from Auburn University, and a J.D. and an M.B.A. from Baylor University. He is presently admitted to both the State Bar of Texas (1996) and the U.S. Patent & Trademark Office (1998). He also has Digital Marketer Mastery certifications for the following: Analytics and Data (pending); Content Marketing; Conversion Funnel; Copywriting; E-Commerce; E-mail Marketing; Paid Traffic; and Search Marketing. Mr. Thrasher's resumé is attached to this disclosure.

Within the past ten years, Mr. Thrasher has not authored any works for third-party publishers. Mr. Thrasher has not served as an expert witness either at trial or by deposition in the last four years.

Mr. Thrasher will express the following opinions at trial:

- Requirements for good-faith-based that DMCA Take Down Notices including that it must be filed with a good-faith belief that a copyrightable work has been infringed;
- A DMCA Notice that is filed prior to the publication of a work is inappropriate and evidences bad faith;
- A DMCA Notice that is filed before the filer has read a written work is inappropriate and evidences bad faith;
- Repetitively filing identical DMCA Notices to the same publisher against multiple, distinctly different publications, is inappropriate and evidences bad-faith;
- The filings of DMCA Notices by Ms. Cain or her representatives demonstrate a pattern of abuse and misuse of the DMCA, and were/are anti-competitive;

- After investigation, no copyright law violations were found in the content published by Zoey Ellis;
- Tropes and scenes-a-fair are not protectable under copyright law.

The facts or data which Mr. Thrasher considered in forming his opinions include his review of the DMCA, the DMCA Notices, additional relevant information, the responses by the Vendors, Ms. Cain's document production in the litigation in Oklahoma, the report drafted by Kristina Busse, and his over 20 years of practice in the fields of Copyright and Trademark Law. Mr. Thrasher considered the following key facts in forming his opinions:

- The DMCAs filed by the Defendant and those filed at her request filed by Blushing Books.
- Ms. Cain's inability to answer any questions regarding the drafting and basis for the filings specifically when asked questions about the DMCAs filed by her and Blushing Books regarding book three in her deposition; and
- The Vendor responses to the rejected DMCAs, particularly in which they explained to Ms. Cain after the first round of DMCAs that ideas were not copyrightable, and afterwards when Ms. Cain continued to direct filing of new, identical, DMCAs.

Mr. Thrasher has not yet prepared any exhibits to summarize or support his opinions, and may choose not to do so. If he does, Plaintiff will supplement this disclosure immediately.

For his expert services in this case, including study, preparation, and testimony, Mr. Thrasher will be paid an expert fee of \$300.00 per hour, plus travel and other expenses.

Plaintiff reserves its right to supplement the opinions provided by the above-referenced experts.

Reviewed and acknowledged:

A handwritten signature in black ink, appearing to read "St Thrasher", is written over a horizontal line.

Steven Thrasher May 4, 2020

May 4, 2020

Respectfully submitted,

QUILL INK BOOKS LIMITED

By: /s/ John M. Bredehoft
John M. Bredehoft
Virginia State Bar No. 33602
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Norfolk, Virginia 23510
757-624-3000
757-624-3225 (direct)
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Counsel for Plaintiff
Quill Ink Books Limited

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

/s/ John M. Bredehoft
John M. Bredehoft
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Steven Thrasher

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214-502-5923 (phone) swthrasher@gmail.com

I navigate the legal mazes of intellectual properties (including patents, trademarks, copyrights and demand/cease-and-desist letters), contracting, various regulations (such as email marketing issues), and fund-raising.

Format:

Part 1: **Experience Statements**

Page 2: **Employment History, Patents Received, Presentations and Publications**

Page 3: **Ventures Created and Education**

Page 5: **Bar Admissions, Organizations and References**

Experience Statements

Exemplary Clients:

Outside General Counsel, Stackpath, Inc.

Pioneered Intellectual Property Strategy, Assist General Counsel on an ad-hoc basis

Contact: General Counsel, Carista Hill 214-704-3790 (carista.hill@stackpath.com)

Outside General Counsel, National Federation of Republican Assemblies (NFRA)

Manages Trademark Portfolio, Corporate Formalities, and Human Resources Issues

Contact: President, Willes Lee 808-347-8126 (willeslee@aol.com)

Other Legal Experience

Grows, manages and provides visionary leadership to intellectual property portfolios (patents, trademarks, copyrights, and trade secrets) for businesses and public institutions. As a licensed USPTO patent attorney, Steve has deep experience with hardware including wireless communications (CDMA, 3G, Bluetooth, Wifi, X10), silicon wafer processing, as well as software technologies including database management, Application Programming Interfaces (APIs), Graphical User Interfaces (GUIs), digital transformation, and health.

Strategically plans and implements business and organizational intellectual property strategies, for US and international markets. Regularly prepares and files trademarks, patent, copyrights, non-disclosure agreements, contractor agreements, employment agreements, online privacy statements, terms of service, and common business contracts. Experience with reviewing and explaining mergers and acquisitions, due diligence, and funding matters, as well as creating Texas, Nevada and Delaware corporations, and LLCs.

Science and Technology:

Engineering experience, and technology enthusiast. Deep knowledge of software systems and technology – especially data search (recipient of patents), APIs, the internet of things (patent recipient), cyber/data security, and e-commerce. Represented the University of Texas (UT) System (2004 - 2006), and Baylor

Healthcare System's Commercialization Department (2009-2011), and pioneered the largest single-patent license to date for the UT System.

Regulatory and Government Administration:

Deep knowledge of the Patent and Trademark Office Rules and Office Procedures, including international legal schemes (specifically, NAFTA, WIPO, PCT, and the Paris and Bern Conventions). Mediation/litigation experience in Texas and Federal Courts. Small Business Innovation Research (SBIR) grant applicant. Additional knowledge of online and email regulations, such-as the Digital Millennium Copyright Act (DMCA) and CAN-SPAM Act.

Valuation and Expert Witness:

Valued intellectual property for business transactions (funding, mergers and licenses), litigation, and for the Securities and Exchange Commission (SEC). Deep due-diligence experience. Expert witness in patent, trademark and copyright litigations, including Patent Office procedures for complex patent prosecution.

Leadership and Public Appearances:

Project vision creation and management at multiple businesses and non-profit organizations. Board of Directors United Inventors Association.

Eagle Scout. Board of Trustees of Kiwanis Youth Services Program: Key Club.

Presentations to live audiences of 2000+

Dallas Market Talk Radio and Television Appearances (CNN and ABC)

Other Relevant Experience:

Spanish Language Proficiency: Medium-low (includes presentations in Spanish).

Traveled to 42 Nations, holds current US passport.

Marketing Technologies (including funnel creation, email "auto-responders," and work-flow management), including Click-Funnels, Infusion Soft, Aweber, Drip, Leadpages, and Samcart. *See also* Digital Marketer Mastery Certifications, below.

Employment History, Patents Received, Presentations and Publications

Employment History

Employers, Legal: (Licensed in Texas)

Maintains Private Law/Consulting Practice (www.thrashlaw.com) since 2002

1998 - 2002 Jackson Walker, Associate, 1998 Jenkins & Gilchrist, Associate

1997 - 1998 Griggs, Robinson, Post, Henderson and Smith, Law Clerk/Associate

Employer, Engineering:

1991 - 1993 McDonnell Douglas Aircraft Corporation, Contract Engineering Temp
Software programming on the Boost Surveillance and Tracking System ("Star Wars Program") and the F-18E/F Avionics 'test bed'/simulator.

Patents (Selected)

US Patent No. 7,797,299 SEARCHING DATA STORAGE SYSTEMS AND DEVICES.
Issued: 14 September 2010.

US Patent No. 7,457,802 INTERNET SEARCHING ENHANCEMENT METHOD FOR
DETERMINING TOPICAL RELEVANCE SCORES. Issued: 25 November 2008.

US Patent No. 7,286,799 REMOTE CALLER IDENTIFICATION (ID) DEVICE.
Issued: 23 October 2007.

US Patent Application No. 12/804,778 SEARCHING DATA STORAGE SYSTEMS AND
DEVICES II. (Allowed).

US Patent Application No. 10/772,954 ELECTRICALLY ISOLATED SYSTEMS,
METHODS AND DEVICES FOR CONTROLLING VENTILATION REGISTERS.

US Patent Application No. 10/794,651 APPLIANCE CONTROL SYSTEM.

US Patent Application No. 13/624,563 SEARCHING DATA STORAGE SYSTEMS AND
DEVICES BY THEME.

US Patent Application No. 15/086,044 BOOLEAN-TYPE LOGIC INTERFACE.

Multiple Additional Patents Pending in Data Search, Data Visualization, and Home
Automation Technologies.

Presentations and Publications (Selected)

Monthly (approx.) Blogger (www.thrashlaw.com/blog & www.befitagain.com/blog)

October 2017 Online Marketing Best Practices, MIT Forum of DFW

March 2016 Technology and Marketing, MIT Forum of DFW

May 2015 Inventing and Provisional Patent Applications, MIT Forum of DFW

May 2010 Open Source Software Compliance, MIT Forum of DFW

January 2009 Software Patents and Bilski—What's Patentable?, MIT Forum of DFW

2002 Co-Author, E-Copyright Practice Manual, Aspen Publishing (Authored
Chapters about the DMCA, and Software Copyrights).

Ventures Created and Education

Ventures Created

2002 – Present: The Invention Factory - Invention Procurement and Development.
Founder. Assists inventors and startups with understanding intellectual property
processes and strategies.

2017 - Present: Liberti Software - Graphical Interface for the Internet. Founder.

2016 - Present: The Juice Shack (Retail (Fruit & Vegetable) Juice Bar and Nutrition Centers). Silent Partner (passive). Related blog: www.befitagain.com (Author).

2003 - Present: Vultair/IoT Solutions of Plano (Home Automation/Internet of Things). Founder and Member (passive). Created home automation solutions, and built patent application portfolio, including US Patent Applications (as inventor and co-inventor) previously identified as well as 10/377,532, and 10/732,610.

2010 – 2014 Advanced Search Labs, Inc. (Database/Internet Search)
Founder and Chief Strategy Officer (CSO). Created innovative database solutions.

2009 – 2013 Proxomo Software, Inc. (App Development)
Founder and CEO (later CSO). Created innovative App “backend” solutions -- created the BaaS technology space. Sold in 2013 to Lucent Mobile Software.

2005 White Nile Software, Inc. (Database Management Software)
Founder and CEO. Developed unique database software.

2004 – 2014 Tree Top Bird Center (Retail Pet & Parrot Store). Silent Partner. Third largest exotic parrot retailer in the USA. Sourced and imported inventory from China.

2003 - 2010 Invention University / The Stirling Group (Technology Licensing)
Founder & Partner. Evaluated and valued university-owned intellectual property, and spearheaded commercialization and licensing efforts for Baylor Healthcare Research, and the University of Texas System, including UT-Arlington.

Education

1997 **Baylor University**, Texas, Masters of Business Administration
Student Assistant to Marketing Professor Schreiber (former SR-71 Pilot)

1996 **Baylor University**, Texas, Juris Doctor
Student Assistant to Intellectual Property Professor Swenson
Credits earned at **Oxford University**, UK, and **UA de Guadalajara**, Mexico

1994 **Auburn University**, Alabama
BS Electrical Engineering, Engineering Honors Society
BS Finance

***Non-Degree Programs**

1999 **Richland Community College**, Minor Equivalent in Spanish

Digital Marketer Mastery Certifications (all current)

- | | | |
|---------------------------------------|----------------------------|---------------------------|
| • Analytics and Data (pending) | • Conversion Funnel | • Search Marketing |
| • Email Marketing | • Copywriting | • E-Commerce |
| • Content Marketing | • Paid Traffic | |

Bar Admissions, Organizations and References

Bar Admissions:

1998 – present, US Patent & Trademark Office

1996 – present, Texas

Organizational Memberships

Republican Party of Texas, Delegate

Massachusetts Institute of Technology (MIT) Enterprise Forum of DFW, Director

Institute of Electrical and Electronic Engineers, IEEE

United Inventors' Association (UIAUSA), Past Director and Finance Chairman

Dallas Inventors' Association Volunteer

American Bar Association

Military

Honorable Discharge, Airman Basic, US Air Force Reserves (DD 256 AF)

Civil Air Patrol, Cadet Lieutenant

Church Home

Covenant Church, McKinney, Texas

Government/Political-Relevant Information

Government: Secret Clearance (1992). Licensed by US Patent and Trademark Office.

GOP: Debate Team at Baylor University College Republicans, delegate to two Texas GOP Conventions (2014 and 2016).

Health and Fitness:

Investor in The Juice Shack of Plano, Texas (www.thejuiceshack.com)

Juicing/Kumbacha Blogger: www.befitagain.com (inaugural blog: February 1, 2018)

Jogger, hiker, P90X and juicing evangelist. Tracks vital signs, vitamins and diet daily.

References

Upon Request